

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE MATTER OF:) IN CHAPTER 7
)
JOHN ROBERT ROEHLK)
) No. **17 B 32596**
)
Debtor(s).)

NOTICE OF MOTION

TO: Office of U.S. Trustee, Via CM/ECF
Joseph S. Davidson Esq., Via CM/ECF
John Robert Roehlke, 620 S. Hough St. Unit G, Barrington IL 60010, Via U.S Mail

PLEASE TAKE NOTICE that on the **21th day of December, 2018**, at the hour of 1:00 p.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable **A. BENJAMIN GOLDGAR**, Bankruptcy Judge, in the Courtroom usually assigned to him, Park City Branch Court, Rm B, 301 Greenleaf Ave. Park City, IL 60085, and then and there present the attached Motion, at which time and place you may appear, if you so see fit.

/s/ JOSEPH E. COHEN
JOSEPH E. COHEN
105 W. Madison St., Ste 1100
Chicago, IL 60602
312/368-0300

STATE OF ILLINOIS)
) SS
COUNTY OF C O O K)

JOSEPH E. COHEN, being first duly sworn on oath, deposes and states that he served a copy of the foregoing Notice together with a copy of the Application attached thereto, directed to the persons shown above, via electronic service or by U.S Mail, this 11th day of December, 2018.

/s/ JOSEPH E. COHEN

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APPLICATION TO EMPLOY ATTORNEYS FOR TRUSTEE

TO THE HONORABLE **A. BENJAMIN GOLDGAR**,
BANKRUPTCY JUDGE

Now comes, JOSEPH E. COHEN, Trustee herein, and respectfully represents unto this Honorable Court as follows:

1. That he is the duly appointed, qualified and acting Trustee in the above-entitled proceeding.

2. That legal services in the nature of the employment of professionals, review of legal documents, and turnover of life insurance proceeds by the Debtor are necessary for a proper and thorough administration of this estate.

3. Your Trustee further represents that JOSEPH E. COHEN and GINA B. KROL of the firm of COHEN & KROL are duly authorized to practice law before this Honorable Court, are familiar with bankruptcy proceedings and that no conflict exists between the Trustee, JOSEPH E. COHEN and GINA B. KROL, the creditors herein, the Debtor, or any person whomsoever entrusted in the within proceedings.

4. Your Trustee further represents to this Honorable Court that it would be for the best interest of this Estate and of the creditors herein that JOSEPH E. COHEN and GINA B. KROL be authorized to perform all legal duties and services and obligations as

might be required in the administration of this Estate and that compensation for such legal services be hereinafter determined in the within proceedings.

5. The to the best of the Trustee's knowledge, JOSEPH E. COHEN and GINA B. KROL of the firm of COHEN & KROL, have no connection with the Debtor, any creditor, any other party in interest including their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the U. S. Trustee.

6. That additional hereto and made a part hereof, is the Affidavit of JOSEPH E. COHEN and GINA B. KROL of the firm of COHEN & KROL.

WHEREFORE, JOSEPH E. COHEN, Trustee herein, prays for the entry of an Order authorizing said Trustee to employ JOSEPH E. COHEN and GINA B. KROL of the firm of COHEN & KROL, to perform all legal services necessary or required in the administration of this Estate, and a compensation for services as said attorneys to be hereinafter determined by this Court and for such other and further relief as the Court shall deem proper.

JOSEPH E. COHEN
GINA B. KROL
COHEN & KROL
105 W. Madison St., Ste 1100
Chicago, IL 60602
312/368-0300

JOSEPH E. COHEN, Trustee

BY: /s/ JOSEPH E. COHEN
One of Attorneys for Trustee